



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, NW
Washington, D.C. 20240

In reply refer to:

H32(2280)

Janet Snyder Matthews, State Historic Preservation Officer
Director, Division of Cultural Resources
Department of State
R. A. Gray Building, 500 S. Bronough Street
Tallahassee, FL 32399-0250

Katherine H. Stevenson
Associate Director, Cultural Resource Stewardship and Partnerships
National Park Service
1849 C Street, NW
Washington, DC 20240

Dear Ms. Matthews and Ms. Stevenson:

We have carefully reviewed the nomination for Stiltsville submitted to us by your offices. As you know, this nomination is a modified version of the nomination submitted to the National Register in February 1999 and rejected in March 1999. The property was originally nominated as a district, with significance claimed under Criterion A, in the area of recreation and culture, and under Criterion C, for architecture, and Criteria Consideration G, for properties that were constructed within the last 50 years. The period of significance began in 1960 and ended in 1965. The principal change is that the present nomination claims significance for Stiltsville under National Register Criterion A in the areas of entertainment/recreation and community planning and development as a traditional cultural property, and does not include the earlier claim that the present buildings themselves are significant for their architecture. Other modifications reflect this new argument, including the expansion of the period of significance to 1937 to the present, and the assertion that the property does not have to meet the requirements of Criteria Consideration G. Because the other questions are dependent on the eligibility of Stiltsville as a traditional cultural property, this letter will concentrate on that critical issue.

The National Register bulletin *Guidelines for Evaluating and Documenting Traditional Cultural Properties* defines a traditional cultural property as “one that is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community’s history, and (b) are important to maintaining the continuing cultural identity of the community.” The bulletin defines “culture” as the “traditions, beliefs, practices, lifeways, arts, crafts, and social institutions of any community.” It defines “traditional” as referring to “those beliefs, customs, and practices of a living community of people that have been passed down through the

generations, usually orally or through practice.” Stiltsville does not meet the definition of a traditional cultural property.

The documentation does not clearly define the community with which Stiltsville is associated. It does not identify the cultural practices or beliefs associated with Stiltsville, indicate how these practices and beliefs can be considered traditional, or explain why they are important in maintaining the community’s cultural identity. Although it suggests that the community generally includes the entire “Biscayne Bay area” (page 8/10) or the “people and communities around Biscayne Bay” (page 8/11), the nomination lacks the citations of ethnographic, ethnohistorical, folklore, or other studies that are usually required to identify the community, to define the traditional cultural beliefs, practices, etc., and to explain the ways in which they are critical to maintaining the cultural identity of that community.

The nomination does not provide convincing evidence of the long-term significance of Stiltsville. The documentation includes many letters and other appreciative comments from visitors to Stiltsville in the 1950s and 60s. It also contains evidence that the importance of this place was in dispute. During its “hot spot” days, some local residents wanted Stiltsville removed, regarding it as a “menace to property to the north of Cape Florida and the west on the mainland” (quoted on page 8/4). In the 1950s, residents of Key Biscayne saw Stiltsville as an eyesore inhabited by “squatters” who did not pay taxes (page 8/5). The 1965 decision of the Metro-Dade County Building and Zoning Department to prohibit any new construction on the flats also casts doubt that the importance of the area was commonly understood. According to the nomination, as late as 1976, Bruce Smathers, then Florida’s Secretary of State, called for the eradication of Stiltsville because it was a blight on Biscayne Bay (page 8/8).

The National Register Bulletin on evaluating traditional cultural places specifically states that “significance ascribed to a property only in the last 50 years cannot be considered traditional.” Because the nomination provides no evidence of the cultural importance of Stiltsville to a defined community prior to 1949 and includes evidence of conflicting views on its value since that time, we have concluded that the property does not meet the National Register Criteria for Evaluation as a traditional cultural property.

In our previous comments, we stated that Stiltsville also does not meet National Register standards of exceptional historical or architectural importance that are required for properties that have achieved significance within the last 50 years. According to the nomination, all but one of the houses was rebuilt after the 1965 hurricane; the remaining one was rebuilt after the 1960 hurricane. Only seven houses remain on the flats, the only ones to survive from a collection that once numbered almost 30. None of them has any association with Stiltsville’s early colorful history of semi-illicit commercial clubs. According to the nomination, the institution of the lease system ended the existence of commercial clubs in Stiltsville, as evidenced in a series of 1967 letters. Even the unusual construction techniques used to build the existing houses, designed to resist high winds and mandated by the new building codes introduced after the 1965 hurricane, serve to emphasize the differences between the Stiltsville of the 1990s and that of the 1930s, 40s, and 50s.

Finally, the present documentation nominates Stiltsville as a site. It states:

Having small vernacular buildings on the site is vital to the site’s integrity . . . If all the houses now on the site blew away in a hurricane tomorrow, the site would retain its visual character if

similar houses were built on it afterwards.

We cannot agree that the historic integrity of Stiltsville has survived the destruction of its historic character-defining buildings. This would be equivalent to saying that if all the 19th century two-story commercial buildings in a historic downtown were torn down and replaced with new ones, the construction of new buildings would restore the historic character of the district as long as they were similar commercial buildings.

Stiltsville therefore does not meet any of the National Register Criteria for Evaluation and is not eligible for listing in the National Register of Historic Places. We are returning the nomination with this letter.

Sincerely,

(signed October 22, 1999)

Carol D. Shull
Keeper of the National Register of Historic Places
National Register, History, and Education

Enclosures